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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TOMAS PEREZ,

Plaintiff,

v.

BARRICK GOLDSTRIKE MINES, INC., a
foreign corporation,

Defendant.

Case No.: 3:19-cv-67-RCJ-WGC

**ORDER TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT**

[SECOND REQUEST]

It is hereby stipulated by and between the parties, through their respective counsel, that Plaintiff, TOMAS PEREZ, (hereinafter referred to as "Plaintiff"), shall have a further extension from Monday, December 14, 2020 to and including **Wednesday, December 16, 2020**, in which to file his Response to Defendant's Motion for Summary Judgment. Additionally, the Defendant BARRICK GOLDSTRIKE MINES, INC. shall have a reciprocal extension to and including **Wednesday, January 13, 2021**, in which to file its Reply to Plaintiff's Response. This stipulation is submitted and based upon the following:

1. That Plaintiff's counsel has requested this extension of time and has informed Defendants' counsel that he has had logistical difficulties in communicating and working with Mr. Perez who lives in Elko and has limited English language capabilities.

Plaintiff's counsel requires the input of Mr. Perez to complete the briefing on the summary judgment response including, especially, preparing an extensive declaration for Mr. Perez to sign and because this document will be in English, Mr. Perez must engage the language assistance of his relative who works during the day and is only available in the evenings.

2. So as not in any way to prejudice Defendant by this extension, it previously agreed deadline for its Reply is also being extended by a corresponding two days to January 13, 2021.

3. That this request for an extension of time for Plaintiff to file his Response to Defendants' above referenced Motion for Summary Judgment is made in good faith and not for purpose of delay.

DATED this 14th day of December, 2020.


/s/ James P. Kemp

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IT IS SO ORDERED



U.S. DISTRICT COURT JUDGE

Dated: December 21, 2020.

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